

Carol Ann Slocum, Esquire

Mark B. Sheppard, Esquire (*pro hac vice* admission pending)

James A. Petkun, Esquire (*pro hac vice* admission pending)

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RICHARD MCBRIDE, JOHN BEVERLY,
VICTOR LAMSON, DONALD TAYLOR,
RYAN FENNAL, MICHAEL VENEZIALE,
THOMAS MONZO, MANUEL
MARTINEZ, DANIEL MITCHELL,
KEVIN CUNNINGHAM, JUAN LOPEZ,
WAYNE GROVE, WILLIAM NEWNAM,
JR., and RYAN SHORT,

Plaintiffs

v.

KLINE CONSTRUCTION CO., INC.,
KLINE CONSTRUCTION CO., INC.
401(K) PLAN, KATHERINE KLINE-
PENATE, J. EDWARD KLINE, and
ROBERT MILLER,

Defendants.

Civil Action No.: 1:19-cv-14275-NLH-JS

JURY TRIAL DEMANDED

**CERTIFICATION CAROL ANN
SLOCUM IN SUPPORT OF ORDER
GRANTING *PRO HAC VICE*
ADMISSION OF JAMES A. PETKUN,
ESQ.**

I, Carol Ann Slocum, Esq. certify and affirm the following:

1. I am an attorney at law licensed to practice in the State of New Jersey and the United States District Court for the District of New Jersey. I am a Partner at the law firm of Klehr Harrison Harvey Branzburg LLP, counsel for Defendants J. Edward Kline and Katherine M. Kline-Penate (“Defendants”).

2. I am making this certification in support of the Motion to admit James A. Petkun as *pro hac vice counsel* to the New Jersey Bar for the purpose of participating in the above entitled litigation.

3. As set forth in the Certification of James A. Petkun, he is a member in good standing with the Pennsylvania Bar. Mr. Petkun is a Member of the law firm of Klehr Harrison Harvey Branzburg, LLP. There are no disciplinary proceedings pending against him.

4. Mr. Petkun will review and make himself familiar with the rules of this Court.

5. I respectfully submit that there is good cause for the admission of Mr. Petkun *pro hac vice*. Mr. Petkun is fully familiar with the facts and circumstances of this case. Mr. Petkun not only has significant knowledge of this matter, but also has substantial familiarity with the documents and facts underlying this action.

6. This firm and the undersigned shall sign all pleadings, briefs, and papers filed with the Court and shall be responsible for the conduct of the cause and for the conduct of Mr. Petkun.

7. In accordance with L. Civ. R. 7.1(d), we respectfully submit that no memorandum of law is necessary as the legal issues raised by this motion under L. Civ. R. 101.1(c) are not novel or complex.

8. For the reasons set forth herein and in the accompanying Certification of James A. Petkun, it is respectfully submitted that good cause exists for the admission *pro hac vice* Mr. Petkun.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: October 30, 2019

By: /s/ Carol Ann Slocum

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